

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In Re: Amy Sue McCreight : Case No: 17-51066
Debtor(s) : Chapter 13 Judge: C KATHRYN PRESTON
: 341 Date: April 5, 2017

CHAPTER 13 TRUSTEE'S OBJECTION TO CONFIRMATION

Now comes Frank M. Pees, Standing Chapter 13 Trustee, and objects to the confirmation of the plan and requests that the Court enter an Order denying confirmation for the reasons set forth below and dismissing the case, pursuant to 11 U.S.C. §1307. This objection supersedes any prior objection filed in this case by the Trustee.

Above median income Below median income _____

11 U.S.C. §1325(a)(1)-Plan does not comply with all provisions of Chapter 13 of Title 11 and the other applicable provisions of Title 11:

Debtor has failed to file a complete list of creditors, statement of financial affairs, schedules including current income and expenses, or other filing requirements, pursuant to 11 U.S.C. § 521. **Clarify basis real property located @ 309 Saratoga St., is disclosed on Schedule A as an asset to the debtor, as per description property is not deeded to debtor.**

Other: **Provide support valuation for Disney timeshare.**

11 U.S.C. Section 1326(a)(1)-Debtor(s) have failed to tender the following pre-confirmation payments not later than 30 days from the filing of the plan or petition (whichever is earlier): **Debtor failed to tender 1st plan payment = \$3000.00 (2nd plan payment due 04/28/17).**

Pursuant to LBR 3015-2(a), amendments necessary to place the plan in a posture for confirmation must be filed at least ten (10) days prior to the hearing on confirmation set for May 18, 2017, unless Debtor(s) have entered into an Agreed Order with the Trustee and so are bound by the terms of that Order.

Therefore, the Trustee prays that confirmation is denied and this case be dismissed for cause pursuant to §1307(c).

TERMS OF THE PLAN:

Plan Payments: \$3000.00/1 mos; \$2600.00/REM

Best Interest Dividend: 9% Dividend: 100%

Length: 36 Months

Dated: April 11, 2017

Respectfully submitted,

/s/ Frank M. Pees

Frank M. Pees
Chapter 13 Trustee
130 East Wilson Bridge Road #200
Worthington, Ohio 43085
(614) 436-6700
trustee@ch13.org

CERTIFICATE OF SERVICE

The undersigned hereby certified that on the date shown below a copy of the Trustee's Objection to Confirmation was served electronically on the Office of the United States Trustee and Debtor's attorney, and on the Debtor(s) at the address as currently shown in the Trustee's records by regular first class mail, postage prepaid.

Dated: April 11, 2017

/s/ Frank M. Pees

Frank M. Pees
Chapter 13 Trustee
130 East Wilson Bridge Road #200
Worthington, Ohio 43085-6300